



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**  
WASHINGTON, D.C. 20460

July 23, 1993

OFFICE OF THE ADMINISTRATOR  
SCIENCE ADVISORY BOARD

EPA-SAB-EPEC-COM-93-005

Honorable Carol M. Browner  
Administrator  
U.S. Environmental Protection Agency  
401 M Street, S.W.  
Washington, DC 20460

Dear Ms. Browner:

We would like to take this opportunity to express our serious concern over the Agency's apparent decreasing research and management activity in the coastal environment. Funding requested in the FY94 budget for coastal programs appears to have been disproportionately cut relative to fresh water, terrestrial and atmospheric efforts. The trend toward diminished attention to coastal systems appears inconsistent with the "ecosystem approach" to environmental management. In addition, the Agency's current coastal effort is fragmented, with scientists and staff distributed among several offices with differing leadership and goals. The combination of these factors results in a disturbing situation. We do not wish to imply that the individuals involved in the programs are disinterested or in any way incompetent. They are not. However, we feel that recognition of these issues at the highest levels is appropriate.

Coastal ecosystems deserve priority research and management attention from the Agency for a number of reasons. First, human demographic projections for the United States indicate a continuing migration to the coasts of our country. As a result, coastal ecosystems will receive increasing loads of industrial and domestic wastes (from both point and nonpoint sources) and will experience continuing habitat degradation and loss. Second, we increasingly recognize the critical linkages between terrestrial, fresh water, and estuarine systems. Management and protection of these interdependent systems requires an understanding of environmental processes at the landscape scale.

We feel that the Agency has a unique ability to play a leadership role in the protection of coastal and marine ecosystems. For example, the Agency has regulatory authority, under statutes such as the Clean Water Act, Coastal Zone Act Reauthorization Amendments, Marine Protection, Research and Sanctuaries Act,



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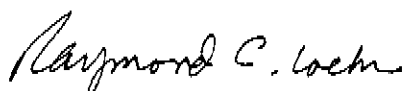
and Comprehensive Emergency Response, Compensation and Liability Act, to: provide guidance to states on nonpoint source management measures which must be implemented in coastal areas; regulate point sources of pollution, including discharges into coastal waters; establish guidelines for disposal of dredged material into wetlands, coastal and ocean waters; and, remediate contaminated sediments at coastal Superfund sites. These regulatory programs should be supported by a strong scientific research effort. We see the Agency's role as complementing, rather than competing with, the coastal research and management programs of other federal agencies such as NOAA and the U.S. Fish and Wildlife Service.

The existing deterioration of many of our marine and estuarine resources will likely worsen, unless we are better able to manage our wastes and receiving waters. This requires that we have a better understanding of the sources, stress regimes, and knowledge of transport, fate, and effects of anthropogenic substances, bacteria and viruses in estuarine and marine systems. In order to obtain this increased scientific knowledge, the Agency will need a renewed commitment to coastal and marine research, and a visible, unified coastal program.

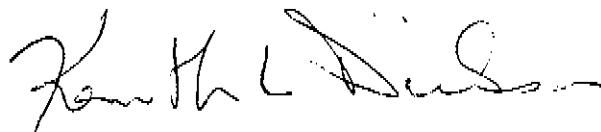
The recently released National Research Council report, "Managing Wastewater in Coastal Urban Areas," states that conducting environmental risk assessments in the coastal environment is an appropriate way to determine the required level of wastewater treatment in the context of all sources (point and nonpoint) of contaminants to coastal systems. This finding supports the Science Advisory Board's recommendations in "Reducing Risk" that the Agency undertake environmental risk assessment to establish priorities. It also supports our contention that more coastal research is warranted, since environmental risk assessments require a fundamental understanding of the various stressors of concern. At this time, our understanding is limited. Only through research will this problem be corrected.

Thank you for the opportunity to bring to you our concerns. We would be happy to discuss this further with you, or at your request, to conduct an in-depth review of the Agency's efforts in coastal areas.

Sincerely,



Dr. Raymond C. Loehr, Chair  
Executive Committee  
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Dr. Kenneth L. Dickson, Chair  
Ecological Processes and  
Effects Committee

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